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4 Attorney for Debtor(s) David O. Kinley & Shei M. Kinley

5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF CALIFORNIA
7 SACRAMENTO

8 In re

9 David O. Kinley
XXX-XX-1484

10 Shei M. Kinley
11 XXX-XX-2171

12 Debtors.

Case No. 10-29636

DC No.: SNM-1
DATE: MAY 25, 2010
TIME: 9:00 A.M.
DEPT#: C - COURTROOM 35
HONORABLE JUDGE KLEIN

13 **MOTION FOR AN ORDER APPROVING ABANDONMENT OF**
14 **SDA EQUIPMENT SERVICE (A SOLE PROPRIETORSHIP)**

15 TO THE HONORABLE BANKRUPTCY JUDGE,

16 The Motion of David O. Kinley and Shei M. Kinley respectfully represents:

- 17 1. Movants filed a voluntary petition for relief under Title 11 of the United States
code on April 14, 2010.
- 18 2. At the time of the entry of the order for relief debtors were in possession of the
19 following described property: SDA Equipment Service, a sole proprietorship,
located at 250 West Channel Rd #B, Benicia, CA 94510, consisting of personal
20 property described on Schedule B and as more particularly described on debtors
declaration filed herewith.
- 21 3. The property so described is claimed as exempt by the debtors under CCP
22 703.140(b)(6) and CCP 703.140(b)(5) and no administration by the trustee is
contemplated.

23 4. Movants desire to continue to operate said business during the pending of the
24 bankruptcy proceeding and require an order of abandonment under Bankruptcy
Rule 6007.

25 WHEREFORE, Movant prays that the trustee in the above-stated case be required to
26 abandon said personal property and for such other and further relief as is just and proper.

27 Dated: April 19, 2010
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30 /s/ Stephen Murphy
STEPHEN MURPHY
31 Attorney for Movants
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